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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. CR 06-330 SI
Plaintiff,) STIPULATION AND [PROPOSED]
v.) PROTECTIVE ORDER RE: DISCOVERY
BRIAN DOWNING WOODSON,) OF CHILD PORNOGRAPHY
Defendant.) SAN FRANCISCO VENUE

With the agreement of the parties, and with the consent of the defendant, the Court enters the following order:

____ Defendant is charged with certain offenses pertaining to the attempted receipt of child pornography in violation of 18 U.S.C. § 2252 (a)(2) and (b)(1). The United States will produce to counsel for the defendant in this case discovery, including digital media, that contains images of child pornography. Pursuant to the child victim privacy provisions of 18 U.S.C. § 3509(d) and Federal Rule of Criminal Procedure 16, the United States requests that disclosure of these materials be subject to the following restrictions:

1. Except when being actively examined for the purpose of the preparation of the defense of

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1 defendant Brian Woodson, the digital and/or paper media produced by the United States
2 to defense counsel, Mr. Geoffrey Hansen, shall be maintained in a locked, safe, and
3 secure drawer, cabinet, or safe which is accessible only to Mr. Hansen, members of his
4 trial preparation team working with him to prepare Mr. Woodson's defense, and his
5 investigator. Mr. Hansen, members of his trial preparation team, and the investigator
6 shall not permit any person access of any kind to the digital and/or paper media or
7 information related to child victims except as set forth below.

- 8 2. The following individuals may examine the digital and/or paper media for the sole
9 purpose of preparing the defense of defendant Brian Woodson and for no other purpose:
 - 10 a. Counsel for the defendant, Geoffrey Hansen;
 - 11 b. Persons employed by the Office of the Federal Public Defender who are assisting
12 with the preparation of Brian Woodson's defense;
 - 13 c. Defendant Brian Woodson, but only in the presence of his attorney;
 - 14 d. Any expert(s) retained on behalf of defendant Brian Woodson to assist in the
15 defense of this matter; and
 - 16 e. Any investigator(s) retained on behalf of defendant Brian Woodson to assist in the
17 defense of this matter.
- 18 3. A copy of this order shall be maintained with the digital and/or paper media at all times.
- 19 4. All individuals other than Mr. Hansen and Brian Woodson who receive access to the
20 materials pursuant to this Order, prior to receiving access to the materials, shall sign a
21 copy of this Order acknowledging that:
 - 22 a. They have reviewed the Order;
 - 23 b. They understand all its contents;
 - 24 c. They agree that they will only access the digital media for the purposes of
25 preparing a defense for defendant Brian Woodson;
 - 26 d. They will not make any copies of any image files within the digital media without
27 further order of the Court;
 - 28 e. They will not access the digital media from any computer that is connection to the

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1 Internet or to any local network; and
2 f. They understand that failure to abide by this Order may result in sanctions by this
3 Court and in state or federal criminal charges for possession or dissemination of
4 child pornography.

5 Counsel for Brian Woodson, Mr. Hansen, shall promptly file signed copies of the Order,
6 ex parte and under seal. The United States shall have no access to these signed copies
7 without further order of the District Court.

8 5. No other person may be allowed to examine the material without further court order.
9 Examination of the digital and/or paper media shall be done in a secure environment
10 which will not expose the materials to other individuals not listed above.
11 6. No copies of any image files contained in the digital and/or paper media may be made
12 without further court order. The prohibition on copying includes (1) printing out images
13 onto paper or film and (2) duplicating the images in any digital format. Non-image files
14 such as word processing files, e-mails, and other text files may be duplicated to the extent
15 necessary to prepare the defense of this matter.
16 7. The computer from which the digital media will be accessed shall not be connected to the
17 Internet or to any other computer network.
18 8. Any pleadings that include or make reference to the above-described materials or their
19 contents shall be filed under seal.
20 9. Within five court days of the judgement and sentencing hearing in this matter, all material
21 provided to defense counsel pursuant to this Order, and all other authorized copies, if any,
22 shall be returned to the United States. The United States shall destroy them. If defendant
23 believes that he must maintain the material for any reasons related to appeal, defendant
24 must seek authorization from the District Court within five days of the sentencing and
25 judgment in this matter.

1 SO STIPULATED:

2 KEVIN V. RYAN
3 United States Attorney

4 Dated: 7/7/06

5 By: /s/
6 SUSAN REED JERICHE
7 Assistant United States Attorney

8 Dated: 7/10/06

9 /s/
10 GEOFFREY HANSEN
11 Attorney for Defendant

12 IT IS SO ORDERED that disclosure of the above-described discovery materials shall be
13 restricted as set forth above.

14 Dated: _____

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16 SUSAN Y. ILLSTON
17 United States District Court Judge

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